

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

JAMES M. ADKINS, Administrator
of the Estate of Ralph E. Adkins,
deceased, et al.,

Plaintiffs,

v.

MONSANTO COMPANY, a
Delaware corporation,

CIVIL ACTION NO. 81-2098
(Consolidated with Civil
Action Nos. 81-2239 and
81-2504 for Discovery)

Defendant.

EXCERPTS FROM DEPOSITION
OF DR. RICHARD C. WALLACE
TAKEN ON MAY 23, 24 & 26, 1983

Q. Tell us your name, will you, sir?

A. Richard C. Wallace.

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Q. Let me ask you this, Doctor. You have been the plant physician for Monsanto at Nitro for how many years, sir?

A. September 5, 1950 to the present. Almost 33 years.

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Q. I am going to talk about some symptoms here. And I am going to ask you some questions. These are symptoms or complaints.

Fatigue, persistent cough, sore throat, nausea, upset stomach, dizziness, lightheadedness, sleep difficulties, sleepiness, exhaustion, face red, burning and numb, shortness of breath, breathing problems, dark urine, urine frequency, urination urgency, blood in urine, runny nose, nose bleeds,

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eyes that water or are irritated, loss of vision, aching joints, leg pain, extremities numb and tingling, nervousness, anxiety, ear problems, kidney difficulty, loss of libido, diarrhea, loss of memory, loss of attention or concentration, lumps or lipomas, skin rashes, cancer, weight gain, weight loss, depression, personality change, Peyronie's disease, high blood pressure, chest pains, headaches.

Can any of those symptoms or complaints be related to 2,3,7,8 tetrachlorodibenzo-paradioxin in your opinion?

A. Rash for certain.

Q. Rash?

A. Yes.

Q. Alright. And, of course, would you say chloracne could be?

A. Did you mention chloracne?

Q. No, I didn't mention chloracne. Would chloracne be a problem, that is a medical problem that is related to dioxin?

A. Dioxin is supposed to cause that type of rash. Is that what you are saying?

Q. Yes. Is that your answer?

A. Yes.

Q. That it will?

A. That is what I have read.

Q. Okay. Now will any of those other things in your opinion, can they be related to dioxin exposure?

A. I have heard of complaints that they have had from dioxin exposure.

Q. Pardon me?

A. I have heard some of those complaints. Not all of them.

Q. Which ones?

A. Well, leg aches, mostly subjective symptoms. I can't remember all of them you enumerated.

Q. Did you ever tell anybody that worked in that plant that the chloracne was caused or skin rashes were caused from dioxin?

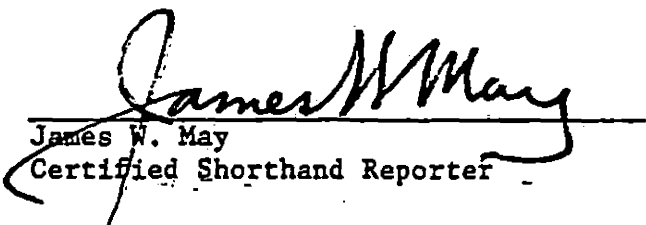
A. No.

Q. Did you ever tell anybody in that plant, and I am talking about the workers, that this list of symptoms that I have related was caused from dioxin?

A. No.

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I do hereby certify that the foregoing are true and correct excerpts from the deposition of Dr. Richard C. Wallace.


James W. May
Certified Shorthand Reporter